

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nathan A. Moore, being first duly sworn on oath, hereby depose and say under oath:

Introduction

1. I am a Detective employed by the Portland Police Bureau and have been since July 2007. I am also a Task Force Officer with the Federal Bureau of Investigation (FBI) and have been since April 2021. I am currently assigned to the Portland Division of the FBI where I investigate computer-related crimes. I have received training in the investigation of computer, telecommunications, and other technology crimes. Since April 2021, I have been involved in the investigation of matters involving the sexual exploitation of children, including the online sexual exploitation of children, in violation of Title 18, United States Code, Sections 2251 and 2252A. I have received over 2500 hours of training regarding criminal investigations and law enforcement techniques. I possess an Advanced Police certification through the Oregon Department of Public Safety Standards and Training (DPSST), and a special deputation with the US Department of Justice to investigate and enforce violations of federal statutes. I am part of the Child Exploitation and Human Trafficking Task Force (CEHTTF), which includes FBI Special Agents and Task Force Officers. CEHTTF is an intelligence-driven, proactive, multi-agency investigative initiative to combat the proliferation of child pornography/child sexual exploitation facilitated by an online computer and other aspects of child exploitation.

2. During my employment with the Portland Police Bureau, I have worked in uniform patrol, plain-clothes narcotics, an investigator with the Special Victims Unit (SVU), and as a Detective in the Assault, Sex Crimes, Robbery, Homicide Crime Scene, and Child Abuse

Details. I have attended training and read research studies regarding sex offender tactics and behaviors. I am familiar with them and have received training on the grooming behaviors of sex offenders. The training I have attended has provided me with insight into the likelihood that people who exhibit a sexual interest in children will commit various sex crimes involving children which includes contact sex offenses and non-contact sex offenses. Non-contact sex offenses include viewing, possessing, disseminating, and encouraging the creation of sexually explicit images of children. I have also attended training regarding methods people use to create, access, view, store and disseminate sexually explicit images of children.

3. I submit this affidavit in support of a criminal complaint and arrest warrant charging JAKOB JOSHUA STICKNEY with one count of 18 U.S.C § 2422(b) – *Coercion and Enticement of a Minor.*

4. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter. The statements contained in this affidavit are based upon the following: my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience.

5. This Court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, this Court is a district court of the United States that has jurisdiction over the offense being investigated. *See* 18 U.S.C. § 2711(3)(A)(i).

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Applicable Law

6. *Title 18, United States Code, § 2422(b)* Coercion and enticement, provides as follows: Whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title and imprisoned not less than 10 years or for life.

Statement of Probable Cause

Attempted Meeting with MV on September 9, 2023,

7. On October 3, 2023, I began investigating Portland Police case number 23-237743. During the review of that case, I learned that on September 9, 2023, Portland Police Officer William Congdon responded to a police call at an address in Portland, Oregon. Officer Congdon met with the mother of a minor female who was 11 years old (“AW”). AW told Officer Congdon that her daughter (“MV”) had been speaking with a purported 17- year-old male on the online chat platform “Discord.” AW told Officer Congdon that, per the conversation she reviewed on Discord, MV and the male had agreed to meet in person.

8. On October 3, 2023, I met with AW at her residence. AW gave me the cellular phone used to communicate with the suspect and I was able to review the conversation between the suspect and MV. I found that the conversation between the suspect and MV began on September 5, 2023, and was highly sexual in nature. The following are excerpts of the conversation between MV and “unholo_xx2” (“UNHOLY”):¹

¹ In the interest of brevity, some portions of the cited conversation excerpts are omitted from this affidavit.

UNHOLY: I'm gunna give you an orgasm

MV: What's that?

UNHOLY: It's when that tingling feeling when you rub your pussy gets so intense that your body shakes and you feel like everything is amazing I'm not a girl so it's hard to describe it but I know how to make you have one

MV: The videos you send on the server make me tingly-(Smiley face emoji sweating)

UNHOLY: That's exactly right

MV: (sweating emoji)

UNHOLY: I'm gonna do to you what they do in the videos

UNHOLY: You wanna make me happy princess

MV: Yuh^^

UNHOLY: You'll do anything

MV: Mhm^^ (smiley face emoji) I wanna make you happy!

UNHOLY: I'm gonna put my dick inside you and you're going to ride me like a horsey

MV: How?

UNHOLY: I'll teach you

MV: Im pretty sure you and a horse are different

UNHOLY: You'll figure it out princess

UNHOLY: OK for me

UNHOLY: I'll be happy and we'll play all the games you want

9. After reviewing the chat between UNHOLY and MV, I recognized from my training and experience that UNHOLY was employing grooming tactics with MV.

10. During this conversation, UNHOLY also elaborates on his own interests in pedophilia:

UNHOLY: It's hard to fully explain but some men still have their brains wired in the natural way where we see a girl who is old enough to have her period it tells our brains she's ready for baby making because that's how they did it historically you start making babies as soon as you can but then humans went and got all high tech and advanced and people got busy and lives got longer so people waited longer to have kids so eventually someone said hey you're not an adult until you're 18 and a bunch of other countries said no you're an adult at 13 and 14 and 16 and 17 and 19 and 21 even and all this crap to where we made it seem wrong for a man to be attracted to a young girl just because of angry Christians who wanted to brain wash everyone into believing their dumb story

UNHOLY: like all things that suck in the world you can basically blame it on religion

11. I reviewed further conversations between UNHOLY and MV from September 9, 2023. In the chats, the two coordinate where to meet each other shortly after MV has sneaked out of her house. An excerpt of the conversation is below:

UNHOLY: Hey
MV: Omg I almost got caught
UNHOLY: I heard her call your name
MV: My mom is leaving tho
UNHOLY: Good
MV: Are u far
UNHOLY: No
MV: Wanna still meet me
UNHOLY: Mhm
MV: Same place
UNHOLY: Across the street
MV: Ok
MV: Wya
MV: Hurry
UNHOLY: Across the street
UNHOLY: Why?
MV: Where
UNHOLY: Over on Ramona
MV: Do u see me
UNHOLY: No I'm down near the end

12. Shortly after this exchange, AW took over the conversation and continued to speak with UNHOLY, posing as her daughter, MV. An excerpt of that conversation is below.

AW: So ur talkin to an 11 year old....
AW: Come get her
UNHOLY: who this
AW: It's ok I called the police on you...come to my house again and I'll die

Shortly after, AW confronted the male who arrived in front of her house. AW said that the male appeared to be a white male in his 20's and was wearing a hooded sweatshirt. She reported to Officer Congdon that he was driving an older dark red or black SUV with a Washington Plate that contained "AHA8." AW said that he drove away when she approached him.

Cybertip report 176942125 – Enticement of MV

13. On October 25, 2023, the National Center for Missing and Exploited Children (NCMEC) received Cybertipline report 176942125. The Cybertipline report was initiated by Discord. The Cybertipline report included an online chat between discord users with the username I will refer to as "UNHOLY" and MV. The Cybertipline report was received by the

Portland Police Bureau and processed by Portland Police ICAC Analyst Josiah Felix.

14. While processing the Cybertipline report, Analyst Felix provided me with some linked media associated to the chat within the Cybertipline report that he was able to recover. Within the linked media, I found a fully clothed photograph of a female that appeared to be MV. I noted the photograph was sent by MV to UNHOLY during their chat, in which MV asks "Master, my sister says I'm pretty, do you think so?" The file is then sent as part of MV's message. UNHOLY responds "Very pretty (smiley face emoji)." I also located a screenshot of a mapping application sent by UNHOLY. It showed MV's home address and the route he would take to get there. The screenshot showed the user was 9.6 miles away from MV's address at the time it was taken. I reviewed the chat and learned that it was a more complete copy of the same Discord chat I had originally reviewed on MV's phone.

15. I noted that, according to the chat, MV self-identified as "below 17" years old, stated she lived in Portland, and later provided her real name. UNHOLY identified himself as a 17-year-old with the name "Jay." The conversation starts as if they were continuing a conversation from another unknown group chat room on Discord. As the chat continues, UNHOLY is engaging in sexually explicit conversation with MV and explains in graphic detail the sex acts he would like to perform with her.² UNHOLY arranges to meet with MV, and explains the sex acts they will do with each other when they meet. The following is an excerpt of part of the conversation between UNHOLY and MV making plans to meet:

MV:But how would I be able to do that if idk were u are you and can't come here?

MV:

UNHOLY:We're both in Oregon remember

MV:Yuh

MV:But I probably won't be able to find you

UNHOLY:You said you go to the lake

² An excerpt containing representative samples of this language is found above.

MV:Yuh
MV:At night
UNHOLY:I could go there too
UNHOLY: Yeah
MV:🧙 okay, next time I go I'll just send you my location
UNHOLY:Ok well it'll depend on when I work
UNHOLY:Like if I can come that time
MV:Okay
MV:I don't understand why the river though, it's a nice calm place
UNHOLY:Because you already go there by yourself so it wouldn't be suspicious on your tracker
MV:Yuh, I guess
MV:But if I'm there over midnight then the come get me
UNHOLY:You wouldn't be out that late
MV:Okay
UNHOLY:We would just hang out and have some fun before you went home

The conversation later culminates with UNHOLY driving to MV's neighborhood, where MV's mother, AW, confronts him.

Identification of Jakob Joshua Stickney

16. On October 26, 2023, Special Agent Rebecca Brown submitted an Emergency Disclosure Request (EDR) to Google for subscriber records and access logs, revealing the IP addresses utilized by a user, for the following account: justp292@gmail.com. This account was reported by Discord in the aforementioned CyberTipline Report, in connection with user "Unholy_22x." in the chats with MV.

17. On October 26, 2023, Google responded to the EDR. Based on the information provided, I learned the Google user with the Gmail account justp292@gmail.com also had registered the email addresses Stickney.Jakob@gmail.com, idontwanttotalk98@gmail.com, and unholyl137@gmail.com. I also learned the user had a phone number of XXX-XXX-0128. I later learned the phone number and emails were consistent with Police records of JACOB STICKNEY.

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18. Given the above information, I researched the phone number within the Portland Police Records Management System (PPRMS). I found record of JAKOB STICKNEY in PPRMS, showing his listed cell phone number as XXX-XXX-0128. The information gathered in PPRMS came from a traffic accident that STICKNEY was involved on October 22, 2018, as well as an investigation conducted by Lake Oswego Police Department in September 2023.

19. I reviewed the police report filed by Lake Oswego Police Detective Jonithan Funkhouser and learned that he was investigating two other cybertips associated with idontwanttotalk98@gmail.com, which were reported by the electronic service providers Snapchat and MeetMe. Snapchat reported that a user identified with the below information uploaded suspected child pornography to the Snapchat platform on September 11, 2023.

USER: Date of Birth: XX-XX-1998

Email Address: idontwanttotalk98@gmail.com

Screen/User Name: unholy_2x

20. Detective Funkhouser submitted an Emergency Disclosure Request to Google for information to help identify and locate the suspect associated with the Google account idontwanttotalk98@gmail.com. Google provided Detective Funkhouser with the following details:

Android ID: 3771429585909243135

MEID(s): 35698074250152

IMEI(s): 356980742501524

ESN(s):

Serial Number(s): b0q:R5CT43WZ1LV

MAC Addresses:

User Profile: 0

Users: Stickney.Jakob@gmail.com, Jazznerd222@gmail.com,
justp292@gmail.com, arborvitae.wa@gmail.com, idontwanttotalk98@gmail.com,
unholy137@gmail.com.

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21. I noted that the IMEI number of the phone used to log into the Google account associated to Detective Funkhouser's investigation (idontwanttotalk98@gmail.com), matched the IMEI of the phone used to log into the gmail account associated to the cybertip report (justp292@gmail.com) for the Discord account used to communicate with MV.

22. I researched Washington State DMV records and found that JAKOB STICKNEY had a blue 2009 Honda Odyssey van registered to him, with Washington license plate number AHA8873. I noted that this license plate number corresponded with the partial license plate number that AW reported to Portland Police for the suspect that attempted to meet with her daughter, MV.

23. I contacted STICKNEY's Washington County probation officer, Asianna Nelson. PO Nelson told me that STICKNEY is transient and lives in his van. She later verified that the most recent phone number she has used to contact STICKNEY is XXX-XXX-0128.

Conclusion

24. Based on the foregoing information, I have probable cause to believe that JAKOB JOSHUA STICKNEY committed the violation of Title 18 U.S.C § 2422(b) – *Coercion and Enticement*. I therefore respectfully request that the Court issue a criminal complaint and arrest warrant charging JAKOB JOSHUA STICKNEY with that offense.

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25. This affidavit, the accompanying criminal complaint, and the requested arrest warrant were all reviewed by Assistant United States Attorney Eliza Carmen Rodriguez prior to being submitted to the Court. AUSA Carmen Rodriguez informed me that in her opinion, this affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested complaint and arrest warrant.

(By telephone)

NATHAN A. MOORE
Task Force Officer
Federal Bureau of Investigation

Sworn to by telephone or other reliable means in accordance with Fed. R. Crim. P. 4.1(a) at 3:40 pm on November 8, 2023.



HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge